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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA AT ANCHORAGE

STANDARD INSURANCE COMPANY,

Plaintiff,

v.

TRACY GARDNER,

Defendant.

TRACY GARDNER, in her individual and  
representative capacity and on behalf of the Plan,

Counterclaimant and  
Third-Party Plaintiff,

v.

STANDARD INSURANCE COMPANY; and  
LINDA WHEELER, individually; and ANDREW  
KLAMSER, individually,

Third-Party Defendants.

Case No. 3:05-cv-00225-TMB

**UNOPPOSED MOTION  
FOR EXTENSION OF TIME**

COMES NOW plaintiff Standard Insurance Company ("Standard"), by and through counsel, and moves the Court for an extension of time until April 3, 2006, to answer the counterclaim and third-party claims of Tracy Gardner.

As noted in Gardner's Unopposed Motion for Extension of Time in Which To File a Motion for Default or for Third-Party Defendants to Answer, the parties are currently in active

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settlement negotiations. These settlement discussions are being conducted in good faith and are not for the purposes of delay. While the settlement process is not complete, specific settlement offers, including specific dollar amounts and terms, have been exchanged, and the parties are of the opinion that settlement negotiations may soon bear fruit. The parties therefore respectfully request additional time to attempt to conclude a settlement in this case. If a settlement is not reached by April 3, 2006, counterclaimant and third-party defendants will answer or take other appropriate action to respond to the counterclaims and third party claims pending against them.

The undersigned certifies that counsel for defendant/counterclaimant and third-party defendants have been contacted by this office concerning this motion, and they do not oppose this motion or the requested extension.

DATED this 13th day of March, 2006.

LANE POWELL LLC  
Attorneys for Standard Insurance Company

By s/ Brewster H. Jamieson  
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I certify that on March 13, 2006, a copy of the foregoing was served by ECF on:

Linda M. O'Bannon, linda@dillonfindley.com  
Ray R. Brown, ray@dillonfindley.com  
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s/ Brewster H. Jamieson  
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